

Joshua A. Sussberg, P.C.
Christopher T. Greco, P.C.
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

Joseph M. Graham (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

*Proposed Counsel to the Debtors and Debtors in
Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
)	
HOLLANDER SLEEP PRODUCTS, LLC, <i>et al.</i> , ¹)	Case No. 19-11608 (MEW)
)	
Debtors.)	(Jointly Administered)
)	

NOTICE OF FURTHER ADJOURNMENT OF SECOND DAY HEARING

PLEASE TAKE NOTICE that the hearing (the “Second Day Hearing”) scheduled to take place on June 26, 2019, at 11:00 a.m., prevailing Eastern Time, has been adjourned to **July 1, 2019, at 2:00 p.m., prevailing Eastern Time**, with such hearing to be held before the Honorable Michael E. Wiles, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Courtroom 617, New York, New York 10004.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Dream II Holdings, LLC (7915); Hollander Home Fashions Holdings, LLC (2063); Hollander Sleep Products, LLC (2143); Pacific Coast Feather, LLC (1445); Hollander Sleep Products Kentucky, LLC (4119); Pacific Coast Feather Cushion, LLC (3119); and Hollander Sleep Products Canada Limited (3477). The location of the Debtors’ service address is: 901 Yamato Road, Suite 250, Boca Raton, Florida 33431.

PLEASE TAKE FURTHER NOTICE that the matters to be heard at the Second Day Hearing include the following first day motions (the “First Day Pleadings”) to be heard for approval on a final basis:

1. ***DIP Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Authorizing the Debtors to use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Granting Adequate Protection to the Prepetition Lenders, (E) Modifying the Automatic Stay, (F) Scheduling a Final Hearing, and (G) Granting Related Relief [Docket No. 13].
 - A. ***Declaration in Support of DIP Motion.*** Declaration of Saul Burian in Support of the Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Authorizing the Debtors to use Cash Collateral, (C) Granting Liens and Providing Superpriority Administrative Expense Status, (D) Granting Adequate Protection to the Prepetition Lenders, (E) Modifying the Automatic Stay, (F) Scheduling a Final Hearing, and (G) Granting Related Relief [Docket No. 19].
2. ***Cash Management Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue to Perform Intercompany Transactions, and (II) Granting Related Relief [Docket No. 4].
3. ***Wages Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 5].
4. ***Vendors Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Lien Claimants, (B) Import Claimant, (C) 503(B)(9) Claimants, (D) Foreign Vendors, and (E) Critical Vendors, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief [Docket No. 6].
5. ***Customer Programs Motion.*** Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Maintain and Administer their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (B) Granting Related Relief [Docket No. 7].

6. ***Taxes Motion.*** Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Payment of Certain Prepetition Taxes and Fees and (B) Granting Related Relief [Docket No. 8].

PLEASE TAKE FURTHER NOTICE that, in addition to the First Day Pleadings, the Debtors have also filed certain motions and applications that will be heard at the Second Day Hearing (the "Second Day Pleadings"), which include the following:

1. ***Case Management Motion.*** Debtors' Motion for Entry of an Order (A) Establishing Certain Notice, Case Management, and Administrative Procedures and (B) Granting Related Relief [Docket No. 14].
2. ***Insurance Motion.*** Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Insurance Coverage Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto, (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, and (C) Continue to Pay Brokerage Fees, and (II) Granting Related Relief [Docket No. 15].
3. ***Surety Bond Motion.*** Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to Continue and Renew Their Surety Bond Program and (B) Granting Related Relief [Docket No. 16].
4. ***Utilities Motion.*** Debtors' Motion for Entry of an Order (A) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Service, (B) Determining Adequate Assurance of Payment for Future Utility Services, (C) Establishing Procedures for Determining Adequate Assurance of Payment, and (D) Granting Related Relief [Docket No. 17].
5. ***Exit Financing Motion.*** Debtors' Motion for Entry of an Order (A) Authorizing the Debtors to Enter into Exit Backstop Commitment Letter and Fee Letters and (B) Granting Related Relief [Docket No. 18].
6. ***Sealing Motion.*** Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File Exit Backstop Commitment Letter and Fee Letters Under Seal and (II) Granting Related Relief [Docket No. 20].
7. ***Bidding Procedures Motion.*** Debtors' Motion Seeking Entry of an Order (I) Approving the Bidding Procedures and Related Dates and Deadlines, (II) Scheduling Hearings and Objection Deadlines with Respect to the Debtors' Disclosure Statement and Plan Confirmation, and (III) Granting Related Relief [Docket No. 22].
8. ***Carl Marks Retention Application.*** Debtors' Motion for Entry of an Order Authorizing the Debtors to (A) Retain Carl Marks Advisory Group LLC to Provide the Debtors a Chief Executive Officer, a Chief Financial Officer, and Additional Personnel and (B) Appoint the Chief Executive Officer and

Chief Financial Officer *Nunc Pro Tunc* to the Petition Date [Docket No. 64].

9. ***Interim Compensation Motion.*** Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals [Docket No. 65].
10. ***Omni 327(a) Retention Application.*** Debtors' Application for Entry of an Order Authorizing and Approving the Employment and Retention of Omni Management Group as Administrative Advisor for the Debtors and Debtors in Possession *Nunc Pro Tunc* to the Petition Date [Docket No. 66].
11. ***Ordinary Course Professionals Motion.*** Debtors' Motion for Entry of an Order (A) Authorizing the Retention and Compensation of Certain Professionals Utilized in the Ordinary Course of Business and (B) Granting Related Relief [Docket No. 67].
12. ***Bar Date Motion.*** Debtors' Motion for Entry of an Order (A) Setting Bar Dates for Submitting Proofs of Claim, (B) Approving Procedures for Submitting Proofs of Claim, (C) Approving Notice Thereof, and (D) Granting Related Relief [Docket No. 68].
13. ***Houlihan Retention Application.*** Debtors' Application for Entry of an Order (A) Authorizing the Employment and Retention of Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker to the Debtors *Nunc Pro Tunc* to the Petition Date, (B) Approving the Terms of the Engagement Agreement, (C) Waiving Certain Time-Keeping Requirements, and (D) Granting Related Relief [Docket No. 69].
14. ***Kirkland & Ellis Retention Application.*** Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Kirkland & Ellis LLP and Kirkland & Ellis International LLP as Attorneys for the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 70].
15. ***Proskauer Rose Retention Application.*** Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Proskauer Rose LLP as Attorneys for the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* to the Petition Date [Docket No. 71].

PLEASE TAKE FURTHER NOTICE that copies of the First Day Pleadings and Second Day Pleadings may be obtained free of charge by visiting the website of Omni Management Group at <http://www.omnimgt.com/hollander>. You may also obtain copies of any pleadings by visiting

the Court's website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that *your rights may be affected.* You should read the First Day Pleadings and Second Day Pleadings carefully and discuss them with your attorney, if you have one in connection with the chapter 11 cases. (If you do not have an attorney, you may wish to consult with one).

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the First Day Pleadings and Second Day Pleadings, or if you want the Court to consider your views on the First Day Pleadings and Second Day Pleadings, then you or your attorney must attend the Second Day Hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the First Day Pleadings and Second Day Pleadings and may enter orders granting the relief requested in the First Day Pleadings and Second Day Pleadings.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK

New York, New York
Dated: June 24, 2019

/s/ Joshua A. Sussberg, P.C.

Joshua A. Sussberg, P.C.

Christopher T. Greco, P.C.

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

601 Lexington Avenue

New York, New York 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

- and -

Joseph M. Graham (admitted *pro hac vice*)

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

300 North LaSalle Street

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

*Proposed Counsel to the Debtors and Debtors in
Possession*